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April 12, 2012

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street  
Washington, D.C. 20554

Re: *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On Wednesday, April 11, 2012, I, John Nakahata, and Kasey Chow, on behalf of Q LINK WIRELESS LLC, as well as Issa Asad and Paul Turner, CEO and General Counsel, respectively, of Q LINK WIRELESS LLC, spoke with Kimberly Scardino, Divya Shenoy, and Alexander Minard of the Telecommunications Access Policy Division. We discussed Q LINK's Compliance Plan as originally filed on February 10, 2012, and as amended on March 16, 2012.

Issa Asad and Paul Turner made a brief introduction and overview of the Company, its commitment to comply with all FCC rules, its financial and technical capability to provide Lifeline service, its proposed Lifeline plans, its marketing strategy and enrollment procedures, and its commitment to prevent waste, fraud, and abuse of the Lifeline program. Turner stated that while Q LINK is a new company, it draws on the technical expertise of its management team, all members of which have been in the telecommunications industry for over a decade. Furthermore, Q LINK can rely on the financial strength of its holding company, QUADRANT HOLDINGS GROUP LLC.

Asad emphasized Q LINK's procedures regarding fraud prevention. The Company has extra measures in place to confirm customer eligibility both in-house as well as through a third-party verifier to ensure that only qualifying customers will receive the Lifeline benefit and that only one Lifeline benefit will be provided per household. Potential customers will not be enrolled if they do not pass both in-house and third-party eligibility checks.

We discussed specifically Q LINK's kiosk marketing strategy and enrollment process. Q LINK expressed the safety measures associated with its kiosks as well as its intended placement locations to target qualifying low-income consumers. We also discussed in detail Q LINK's Application and Certification Forms and suggested changes.

Ms. Marlene H. Dortch

April 12, 2012

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Finally, counsel for Q LINK reiterated the Company's commitment to comply with the newly amended FCC rules and to prevent fraud in the Lifeline program. Q LINK agreed to have all suggested changes made to its Application and Certification forms and Compliance Plan and to re-file one final Compliance Plan and ETC Application.

Attached is a copy of the presentation deck that was provided at the meeting yesterday. Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart  
Attorney for Q LINK WIRELESS LLC

Attachments

cc: Issa Asad  
Paul Turner  
John Nakahata  
Kimberly Scardino  
Divya Shenoy  
Alexander Minard

Q LINK WIRELESS LLC



# AGENDA

- Introduction to Q LINK WIRELESS LLC
- Financial Capability
- Technical Capability
- Q LINK Lifeline Plans
- Marketing / Advertising Plan
- Enrolling Lifeline Customers
- Recertifying Lifeline Customers
- Preventing Waste, Fraud & Abuse
- Q & A

# Q LINK WIRELESS LLC

Names and Identifiers used by Q LINK WIRELESS LLC:

- Q LINK WIRELESS
- Q LINK

# Q LINK WIRELESS LLC

In compliance with newly amended section 54.202, Q LINK certifies:

- It will comply with the service requirements applicable to the support that it receives;
- It has the ability to remain functional in emergency situations;
- It will satisfy applicable consumer protection and service quality standards; and
- It is financially and technically capable of providing the Lifeline service.

# FINANCIAL CAPABILITY

**Q LINK is financially capable of providing the supported Lifeline service :**

- Wholly owned and financially supported by QUADRANT HOLDINGS GROUP LLC
- QUADRANT HOLDINGS' Current Financials as of Sep. 30, 2011
- Q LINK plans to simultaneously launch both Lifeline and non-Lifeline wireless services after FCC Compliance Plan approval and receipt of ETC designations

# TECHNICAL CAPABILITY

Q LINK is technically capable of providing the supported Lifeline service :

- Key Management Experience
  - **Issa Asad** – 15+ yrs in telecom business/management
  - **Paul Turner** – 10+ yrs in telecom business/legal
  - **Raimundo Lopez-Lima Levi** – 20+ yrs in telecom finance/audit
  - **Mariane Fahmy** – 15+ yrs in telecom marketing/customer service
  - **Ron Rechtman** – 12+ yrs in telecom technology systems/operations
  - **Andrew Lermsider** – 15+ yrs in marketing/advertising



# Q LINK LIFELINE PLANS

**Q LINK proposes a choice between three (3) Lifeline plans:**

- 68 Monthly Minutes
- 125 Monthly Minutes
- 250 Monthly Minutes

**All plans include:**

- Free handset
- Free calls to Customer Service
- Free calls to 911 Emergency Services
- Free Voicemail, Caller ID, and Call Waiting
- Free Domestic Long Distance

# Q LINK LIFELINE PLANS

## 68 MINUTES

**FREE**

**68 anytime minutes**

**Minutes rollover**

**3 texts = 1 minute**

**Free International  
Long Distance\***

**\*100+ designated International  
Long Distance destinations**

## 125 MINUTES

**FREE**

**125 anytime minutes**

**Minutes rollover**

**1 text = 1 minute**

## 250 MINUTES

**FREE**

**250 anytime minutes**

**Minutes do not rollover**

**1 text = 1 minute**

# Q LINK LIFELINE PLANS

## Public Safety and 911 / E911 Access:

- Q LINK will ensure that all handsets used in connection with its Lifeline service are E911-compliant.
- Q LINK will provide its Lifeline customers with access to 911 and E911 services:
  - through its underlying carrier, Sprint
  - at the time of Lifeline service initiation
  - regardless of activation status and minute availability

# Q LINK MARKETING / ADVERTISING PLAN

**All materials will comply with disclosure requirements:**

- Disclose company name under which it does business;
- Explain in clear, easily understood language the following:
  - Only eligible consumer may enroll in the program;
  - What documentation is necessary for enrollment;
  - The program is limited to one benefit per household, consisting of either wireline or wireless service;
  - Lifeline is a government benefit program; and
  - Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

# Q LINK MARKETING / ADVERTISING PLAN

Q LINK intends to market its Lifeline service via:

- TV / Radio spots
- Internet banners
- Direct mail
- Local kiosks
- Flyers / Brochures



The advertisement features the Q Link Wireless logo at the top left. The main headline reads "GET YOUR **FREE CELL PHONE** NOW!". Below this, a large question "Need a **FREE** Cell Phone?" is displayed. To the left of the text is a photo of a smiling woman holding a cell phone. To the right is a starburst graphic that says "Plus Free Minutes Every Month" and an image of three cell phones. Below the main text, a paragraph explains that Q Link Wireless provides free cell phones for income-eligible individuals who participate in programs like Food Stamps or Medicaid. A blue button labeled "See If You Qualify!" with a right arrow is positioned below this text. To the right of the button, three blue arrows point to the following benefits: "No Contracts", "No Monthly Bills Ever!", and "No Credit Checks!". At the bottom right, the text "Get Yours Now!" is written in orange. A small red text block at the bottom left provides a disclaimer about Lifeline support limits and consequences of false statements. Below this, a paragraph states that Q Link Wireless is a provider of the Government's Lifeline program and provides links to terms and contact information. Social media icons for Facebook and Twitter are located at the bottom right.

**Q LINK** WIRELESS  
CONNECTING AMERICA

GET YOUR **FREE CELL PHONE** NOW!

Need a **FREE** Cell Phone?

Did You Know Q Link Wireless Provides **FREE** Cell Phones for income eligible individuals? You may qualify if you participate in programs such as Food Stamps or Medicaid or your income is below 135% of the Federal Poverty Guidelines.

See If You Qualify! ►

Plus Free Minutes Every Month

➡ No Contracts

➡ No Monthly Bills Ever!

➡ No Credit Checks!

**Get Yours Now!**

Lifeline support is limited to one per household on wireline or wireless service. Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Proof of participation in eligible programs/annual household income required for enrollment.

Q Link Wireless is a provider of the Government's Lifeline program. Visit our terms at <http://qlinkwireless.com/terms.aspx> for more info. Call 1-855-QLINK43 or visit <http://qlinkwireless.com> to see if you are eligible.

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# ENROLLING LIFELINE CUSTOMERS

## Eligibility Confirmation:

1. Confirm prospect's identity (see government issued picture ID)
2. Confirm program or income eligibility (see proof)
3. Confirm valid household address and whether permanent/temporary or multi-household (validate w/USPS)
4. Confirm prospect not currently receiving subsidy (ask prospect, perform duplicate check into an internal and pooled external database)
5. Confirm that eligible party has received the handset and has used it prior to seeking reimbursement

# ENROLLING LIFELINE CUSTOMERS


## End-User Education and Disclosures:

- Lifeline is a federal benefit
- Lifeline service is available for only one line per household
- A household is defined, for Lifeline Program purposes, as any individual or group of individuals who live together at the same address and share income and expenses
- Households are NOT permitted to receive benefits from multiple providers
- Violation of the one per household limitation constitutes violation of the FCC's rules and will result in de-enrollment from the program, and potentially prosecution by the U.S. Government

# ENROLLING LIFELINE CUSTOMERS

## End User Attestations:

- See Certification Form



**APPLICATION FOR GOVERNMENT LIFELINE ASSISTANCE PROGRAM**

**Things to know about the Lifeline Program:**

- (1) Lifeline is a federal benefit.
- (2) Lifeline Service is available for only one line per household. A household cannot receive benefits from multiple providers; and
- (3) A household is defined, for purposes of the Lifeline Program, as any individual or group of individuals who live together at the same address and share income and expenses.

Please read all instructions before completing. Information will be validated. Discrepancies could result in delays.

**Q LINK LIFELINE VERIFICATION FORM**

This signed authorization is required in order to enroll you in the Lifeline Program in your state. This authorization is only for the purpose of verifying your participation in these programs and will not be used for any other purpose. Service requests will not be processed until this form has been received and verified by Company. I authorize the company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program.

**Things to know about the Lifeline Program:**

- (1) Lifeline is a federal benefit.
- (2) Lifeline Service is available for only one line per household. A household cannot receive benefits from multiple providers; and
- (3) A household is defined, for purposes of the Lifeline Program, as any individual or group of individuals who live together at the same address and share income and expenses.

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**Section 1: Personal Information**

Last Name: \_\_\_\_\_ First Name: \_\_\_\_\_ MI: \_\_\_\_\_ Birth Date (Month/Day/Year): \_\_\_\_\_ Last Four Digits of SSN: \_\_\_\_\_

Home Phone Number: \_\_\_\_\_ Cell Phone Number: \_\_\_\_\_ Email Address: \_\_\_\_\_

Address: \_\_\_\_\_ Apartment No.: \_\_\_\_\_ State: \_\_\_\_\_ City: \_\_\_\_\_ Zip Code: \_\_\_\_\_

**Plan Features**

Choose your plan (check one)

☐ Local Calls  
☐ National Long Distance  
☐ Voice Mail  
☐ Nationwide Text  
☐ Roaming at no additional cost

☐ Free 911  
☐ 411 Directory Assistance  
☐ Carry-Over minutes from month to month  
☐ 100 International Long Distance destinations

\*Minutes not be used for 411 calling at no additional cost.  
\*Long distance charges will apply.

**Section 2: Eligibility**

To apply for Q Link you may choose ONE of the two options below:

**Option 1: Qualify by certifying you belong to ONE of the programs listed below.**

**Option 2: Qualify by certifying your income is at or below 135% of the Federal Poverty Guidelines.**

**HOUSEHOLD INCOME:** Please check household persons and income level that applies. Eligibility may apply if your total household income is at or below the following guidelines.

Persons in Family or Household	Annual Income	Monthly Income
1	\$14,325	\$1,193
2	\$19,265	\$1,605
3	\$24,205	\$2,017
4	\$29,145	\$2,428
5 or More	\$34,085	\$2,840

For each additional person: \$5,725

Total monthly household income: \_\_\_\_\_ Number of people residing in household: \_\_\_\_\_  
Total yearly household income: \_\_\_\_\_ Number of children under age of 18: \_\_\_\_\_

**Section 3: Attestation**

**PENALTY OF PERJURY:** Under title 18 U.S.C. § 1071, whoever willfully states as true any material matter which he does not believe to be true in a statement under penalty of perjury, is guilty of perjury and shall, except as otherwise expressly provided by law, be fined or imprisoned not more than five years, or both.

I certify, under penalty of perjury (affirmed by Each Certification):

- (1) The information contained in this application remains true and correct to the best of my knowledge and I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.
- (2) I have provided documentation of eligibility if required to do so.
- (3) I understand that I and my household can only have one Lifeline-supported telephone service. Q Link Wireless has explained the one-per-household requirement. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the Lifeline program, and could result in criminal prosecution by the US Government.
- (4) I attest to the best of my knowledge, that I and no one in my household is receiving a Lifeline service from any other land line or wireless company such as Safelink, Assurance, or Roadblock Wireless.
- (5) I understand that my Q Link Wireless Lifeline service is a non-transferable. I may not transfer my service to any individual, including another eligible low-income consumer.
- (6) I understand that my service goes unused for sixty (60) days, my service will be suspended, subject to a thirty (30) day period which I may use the service or contact Q Link Wireless to confirm that I want to continue receiving their service.
- (7) I will notify Q Link Wireless within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify Q Link Wireless if:
- (8) (i) cease to participate in the above federal or state programs, or my annual household income exceeds 135% FPG.
- (9) I will notify Q Link Wireless within thirty (30) days of moving. Additionally, if my address listed above is a temporary address, I understand that I must verify my address with Q Link Wireless every ninety (90) days. If I fail to respond to Q Link Wireless address verification attempts within thirty (30) days, my Q Link Wireless Lifeline service may be terminated.
- (10) Q Link Wireless has explained that I'm required each year to re-verify my eligibility for Lifeline. If I fail to do so within thirty (30) days, I will result in the termination of my Q Link Wireless service.
- (11) I authorize and understand that the Q Link Wireless may provide to state and Federal agencies, as required by law, for the purposes of complying with the Lifeline program at the information related to my account information but not limited to my name, date of birth, social security number, usage history, address and phone number.
- (12) I understand that my name, telephone number, date of birth, last four digits of my social security number, and address will be divulged to the Universal Service Administrative Company (USAC) and/or its agents for the purposes of verifying that I do not receive more than one Lifeline subsidy.
- (13) I understand that if USAC identifies I am receiving more than one Lifeline subsidy, all carriers involved may be notified so that I may select one service and be de-enrolled from the other.

**PRIVACY LAW**

I authorize Q Link Wireless or its duly appointed representative to: (1) access any records required to verify my statements herein; (2) to confirm my continued eligibility for Lifeline assistance; (3) to update my address to a proper mailing address format; and (4) authorize social service agency representatives to discuss with and/or provide information to Q Link Wireless verifying my participation in benefit programs that qualify me for Lifeline assistance. I understand that completion of this form does not constitute immediate approval for Lifeline.

☐ Please check this box if you would like to receive pre-recorded special offers and promotions for Q Link Customers at the Home Telephone number provided in the Contact Information.

Applicant Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Mail application to: Q Link Wireless LLC  
400 East Sheridan Street Suite 300  
Dania Beach, FL 33004

Fax application to: 1-855-83QLINK (855-837-6468)  
For questions please call 1-855-QLINK43 (855-754-6543)

**SIGN & DATE HERE**

**Section 4: Verification**

Last Name: \_\_\_\_\_ Date of Birth: Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_

Cell Phone Number: \_\_\_\_\_

Is ☐ Permanent ☐ Temporary ☐ Multi-Household

Other: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Other: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

**Section 5: Signature**

(Check all that apply)

**FOR OFFICIAL USE ONLY:**

☐ Q Link Recertification  
☐ Documentation Verified  
☐ Recertification Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

**Section 6: Declaration**

I attest to the best of my knowledge and I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.

I am an annual household income at or below 135 percent of the Federal Poverty Guidelines.

I have supported telephone service. Q Link Wireless has explained the one-per-household requirement. I understand that violation of the FCC's rules and will result in my de-enrollment from the Lifeline program, and could result in criminal prosecution by the US Government.

I understand that my Q Link Wireless Lifeline service is a non-transferable. I may not transfer my service to any individual, including another eligible low-income consumer.

I understand that my service goes unused for sixty (60) days, my service will be suspended, subject to a thirty (30) day period which I may use the service or contact Q Link Wireless to confirm that I want to continue receiving their service.

I will notify Q Link Wireless within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify Q Link Wireless if:

(i) cease to participate in the above federal or state programs, or my annual household income exceeds 135% FPG.

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Q Link Wireless has explained that I'm required each year to re-verify my eligibility for Lifeline. If I fail to do so within thirty (30) days, I will result in the termination of my Q Link Wireless service.

I authorize and understand that the Q Link Wireless may provide to state and Federal agencies, as required by law, for the purposes of complying with the Lifeline program at the information related to my account information but not limited to my name, date of birth, social security number, usage history, address and phone number.

I understand that my name, telephone number, date of birth, last four digits of my social security number, and address will be divulged to the Universal Service Administrative Company (USAC) and/or its agents for the purposes of verifying that I do not receive more than one Lifeline subsidy.

I understand that if USAC identifies I am receiving more than one Lifeline subsidy, all carriers involved may be notified so that I may select one service and be de-enrolled from the other.

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Applicant Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Mail application to: Q Link Wireless LLC  
400 East Sheridan Street Suite 300  
Dania Beach, FL 33004

Fax application to: 1-855-83QLINK (855-837-6468)  
For questions please call 1-855-QLINK43 (855-754-6543)

**SIGN & DATE HERE**



# RECERTIFYING LIFELINE CUSTOMERS

## Annual Recertification Compliance:

- Q LINK commits to re-certify the eligibility of all Lifeline customers and report the results to USAC. Because it will not have launched, Q LINK will have no customers as of June 1, 2012.
- Q LINK will continue to re-certify all active Lifeline customers by the annual anniversary of their enrollment.
- All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.
- In addition, Q LINK will continue to follow any state-specific requirements.

# PREVENTING WASTE, FRAUD & ABUSE

- Q LINK utilizes a diligent Enrollment Process
- Q LINK's business model primarily employs direct, in-store or over the phone/internet, high quality contact and customer service
- Q LINK will not seek reimbursement until a customer has personally activated service (by initiation and/or usage)
- Q LINK has a 60-day non-usage policy
- Q LINK emphasizes compliance in all aspects of the Lifeline program – marketing, enrollment procedures, representative training, process documentation, non-usage/de-enrollment procedures

# PREVENTING WASTE, FRAUD & ABUSE

Additional Measures to prevent waste, fraud & abuse:

- **Duplicates Database**
  - CGM, LLC
  - National Database, when in place
- **Provide customer data to PUCs, FCC, and USAC**
- **Independent Biennial Audits\***
  - \*if Q LINK draws \$5 million+ on an annual basis

QUESTIONS?

